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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 TIMOTHY TALAMANTE,  
11 Plaintiff,  
12 vs.  
13 CHRIS PIAETE, *et al.*,  
14 Defendants.

Case No. 3:24-cv-00509-ART-CLB  
**INTERESTED PARTY NEVADA  
DEPARTMENT OF CORRECTIONS  
MOTION FOR EXTENSION OF TIME  
TO FILE SUPPLEMENTAL  
BRIEFING  
(ECF No. 18)**

16 Interested Party, Nevada Department of Corrections, by and through counsel,  
17 Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior  
18 Deputy Attorney General, hereby submit a Motion for Extension of Time to File  
19 Supplemental Briefing in this matter. This Motion is based on Federal Rule of Civil  
20 Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all  
21 papers and pleadings on file in this action.

22 **MEMORANDUM OF POINTS AND AUTHORITIES**

23 **I. ARGUMENT**

24 The Interested Party respectfully requests a ten (10) day extension of time out from  
25 the current deadline (April 9, 2025) to file supplemental briefing in this case. Counsel for  
26 the Interested Party has begun gathering the evidence necessary to respond to the issues  
27 presented. However, Counsel for the Interested Party has a pre-planned out of town  
28 commitment during the week of April 7, 2025. Counsel has agreed to be one of the judges

of the National Finals of the High School “We the People” competition. This is a high school constitutional competition, with high schools around the country competing. In order to judge the competition, Counsel will have to spend the week in Washington DC. Therefore, it will be difficult to file the supplemental briefing in the current schedule.

Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

The Interested Party’s request is timely, and its limited nature will not hinder or prejudice Plaintiff’s case but will allow for a thorough response to the pending motion. The requested ten (10) day extension of time should permit Counsel to gather the remaining evidence and properly supplement the pleadings.

For these reasons, the Interested Party respectfully requests a ten (10) day extension of time from the current deadline to file a joint pretrial order in this case, with a new deadline to and including **Monday, April 21, 2025**.

DATED this 3rd day of April, 2025.

AARON D. FORD  
Attorney General

By: /s/ Douglas R. Rands  
DOUGLAS R. RANDS, Bar No. 3572  
Senior Deputy Attorney General

*Attorneys for Interested Party*

# ORDER

**IT IS SO ORDERED.**

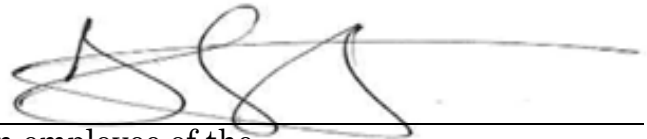
**DATED:** April 3, 2025

  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on April 3, 2025, I electronically filed the foregoing, **INTERESTED PARTY NEVADA DEPARTMENT OF CORRECTIONS MOTION FOR EXTENSION OF TIME TO FILE SUPPLEMENTAL BRIEFING (ECF No. 18)**, via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Carson City, Nevada, addressed to the following:

Timothy Talamante #54405  
Northern Nevada Correctional Center  
Post Office Box 7000  
Carson City, NV 89702



An employee of the  
Office of the Nevada Attorney General